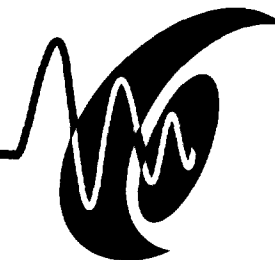


# AMERICAN ACADEMY OF AUDIOLOGY

(Noted on Secretariat's e-mail on 1/13/2009-2021)



January 29, 1996

**BY HAND DELIVERY**

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Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

JAN 29 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: MM Docket No. 95-176; In the Matter of Closed Captioning and Video  
Description of Video Programming

Dear Sir or Madam:

The American Academy of Audiology (AAA) submits this comment in response to the Federal Communications Commission's (FCC) Notice of Inquiry in the above-referenced matter. AAA strongly supports the FCC's goal of making closed captioning of television programming routinely available in the United States. This will provide the current 28 million (and soon to be millions more) Americans who have a hearing loss equal access to the news, educational, and entertainment programming that is so pervasive and essential in our society. Furthermore, the FCC has correctly concluded that widespread closed captioning also will benefit millions of other American citizens, who can use captioning technology to improve literacy, facilitate comprehension in noisy environments, or for other purposes.

AAA encourages the FCC to promptly review all information submitted in response to its Notice of Inquiry, and to propose, as soon as possible, regulations that will guarantee broad provision of closed captioning across the ever-growing range of television services, including broadcast, cable, satellite, and other programming.

## **BACKGROUND**

AAA is the national professional association exclusively representing audiologists throughout the United States. As you may know, audiologists are health care professionals who are specifically trained and licensed to provide non-medical diagnostic, preventive, and rehabilitative care to persons affected by hearing loss and related disorders (e.g., balance problems). Audiologists possess at least a masters-level degree or its equivalent; by the year 2002, a doctoral-level degree will be the minimum requirement for entry into the profession.

Cloning for American Hearing

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In addition to a rigorous academic program, audiologists generally are required to complete a clinical fellowship experience, and to pass a national standardized examination, before they are able to practice.

In their day-to-day practice, audiologists work with people affected by a wide variety of hearing loss, stemming from significantly different causes and producing a broad range of impacts.

Hearing loss can result from congenital disorders, aging, occupational or other noise exposure, illness, or a variety of other factors. From a physiological standpoint, 80 to 90 percent of hearing loss relates to a sensorineural disorder, which creates imperfect reception or transmission of sound waves to the brain. Such hearing loss can be "corrected" only through the use of amplification (e.g., hearing aids) or other assistive devices (e.g., loop, infrared, or FM systems); assistive technologies, such as captioning; sign language; lip-reading; or other adaptive skills. Only 10 to 20 percent of hearing loss results from disease conditions that can be mitigated by medical or surgical treatment.

Hearing loss has a broad range of impacts. For example, communication problems associated with hearing loss can seriously interfere with interpersonal relationships, and can delay the development of language or other learning by children or other persons with impaired hearing. Moreover, some people may be inhibited in terms of social interaction and development because they communicate in ways that are different from others around them. Also, while there is no evidence to suggest that hearing loss (including deafness) imposes intellectual limitations, there are measurable differences in academic and economic/professional performance between people with normal hearing and people with unmanaged hearing loss. This may be due, in large part, to a general inability of people with hearing impairments to receive and communicate information.

### **THE DEMOGRAPHICS OF HEARING LOSS**

The National Institute on Deafness and Other Communication Disorders (part of the National Institutes of Health) estimates that 28 million people in the United States currently are affected by hearing loss. See National Institute on Deafness and Other Communicative Disorders, National Strategic Research Plan, updated in 1992. More than 22 million adults over the age of 65, for example, have a hearing loss, and this number is expected to double

in the next 10 years -- to over 40 million people -- as the "Baby Boomer" generation continues to mature.

Eighty percent of people with hearing loss are affected in both ears. Furthermore, as noted above, in eight out of 10 of cases, hearing loss is permanent (i.e., hearing cannot be restored by medical or surgical treatment). Therefore, closed captioning and other mechanisms for compensating for hearing loss are increasingly critical to ensure the fullest possible participation of U.S. citizens in society.

### **THE IMPORTANCE OF CLOSED CAPTIONING**

People with hearing loss are valuable and productive members of society: they attend school, hold jobs, and are socially active. To maintain an involved and dynamic lifestyle, it is essential for people with hearing loss to have access to the wealth of information available through television and other media.

Television occupies a unique, ubiquitous role in American society. The range of programming information and options it provides, and the level of consumer use, are unparalleled by any other medium. As new technologies expand the types of television services and programming available, and as the "information superhighway" develops, it is clear that television will have an ever-more-important role as a communication tool.

As the FCC notes in its Notice of Inquiry, the U.S. Congress already has recognized that now is the time to ensure that people with hearing loss have access to television through the proven technology of closed captioning. AAA applauds the FCC for fostering this goal, even in the absence of final legislation. Over the last 20 years, the FCC, Congress, and other governmental entities have made significant strides toward ensuring that people with hearing loss have access to television, including recently requiring that all television broadcast receivers with screens of 13 inches or more be capable of displaying closed captions.

Unfortunately, however, as the FCC has acknowledged, without specific legal obligations, there simply is no assurance that suppliers of television programming will provide closed captioning for transmission to decoder-equipped television sets. We recommend, therefore, that the Commission implement regulatory requirements and incentives to ensure that closed captioning is widely provided for television programming of all types. For purposes of economic and practical feasibility, it may be appropriate to impose captioning

requirements in stages. However, AAA firmly believes that regulatory requirements should be put into place quickly, and they ultimately should be comprehensive in terms of the programs and networks covered.

### **OTHER BENEFITS OF CLOSED CAPTIONING**

Although the primary beneficiaries of television closed captioning will be the millions of Americans affected by hearing loss, AAA fully agrees with the FCC that there will be millions of additional beneficiaries of widespread captioning of television programming (e.g., people trying to improve their literacy, people in noisy environments, etc.). This is simply one more reason why the FCC should promptly adopt regulations to ensure the widespread provision of closed captioning for television programming.

### **VIDEO DESCRIPTION**

AAA does not possess any specific information relating to video description of television programming. Nevertheless, we urge the FCC to earnestly pursue its study of video description technology and the benefits it provides. Similar to people with hearing loss, people with vision loss all too often are excluded from the diverse programming that television has to offer. AAA believes that video description of television programming generally will offer to people with vision loss the very significant benefits that closed captioning offers to people with hearing loss.

\* \* \*

AAA urges the FCC to take affirmative steps to guarantee all Americans, including those affected by hearing loss, access to the vast range of information available through television programming now and in the future. Thank you very much for your attention to these comments. We look forward to participating in the next stage of this rulemaking.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Flexer".

Carol Flexer, Ph.D., FAAA  
President